

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
THOMAS W TRIPLER AND PATRICIA M
TRIPLER

Case No. 25-11492-pmm

Chapter 13

Deutsche Bank National Trust Company, as Trustee
for Fremont Home Loan Trust 2006-1,
Asset-Backed Certificates, Series 2006-1,
Movant

vs.

THOMAS W TRIPLER AND PATRICIA M
TRIPLER,
Debtors

**OBJECTION TO CONFIRMATION
OF DEBTORS' CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as Trustee for Fremont Home Loan Trust 2006-1, Asset-Backed Certificates, Series 2006-1 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtors' Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtors filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on April 16, 2025.
2. Movant holds a security interest in the Debtors' real property located at 601 WILLOWBROOK RD, Havertown, PA 19083 (the "Property"), by virtue of a Mortgage.
3. The Debtors filed a Chapter 13 Plan (the "Plan") on April 16, 2025 (Doc 3).
4. The Plan includes payments toward the Note and Mortgage with Movant,

however the figures used by the Debtors are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$113,165.35, whereas the Plan proposes to pay only \$42,845.00.

5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$113,165.35 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE: THOMAS W TRIPLER AND PATRICIA M TRIPLER	Case No. 25-11492-pmm
Deutsche Bank National Trust Company, as Trustee for Fremont Home Loan Trust 2006-1, Asset-Backed Certificates, Series 2006-1, Movant	Chapter 13
vs.	
THOMAS W TRIPLER AND PATRICIA M TRIPLER, Debtors	

CERTIFICATE OF SERVICE

I, the undersigned, certify that on May 15, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- OBJECTION TO CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: May 15, 2025

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Mario Hanyon, PA Bar No. 203993
Ryan Srnik, PA Bar No. 334854
Jay Jones, PA Bar No. 86657
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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

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